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5 Attorney for Debtor Sharon Mahoney

6 **UNITED STATES BANKRUPTCY COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**

8 In the Matter of:) Case No. 10-57326
9 Sharon Mahoney) **PRE-HEARING STATEMENT**
10)
11 Debtor) Pre-Hearing Date: 3/8/2011
Pre-Hearing Time: 1:45PM
Place: 280 South First Street, Room 3020
Judge: Arthur S. Weissbrodt

12 Debtor, Sharon Mahoney,

13 Has addressed all objections of the Chapter 13 Trustee, including the 1 objection filed by the
14 trustee on 10/25/2010 and the 4 objections filed by the trustee on 8/26/2010.

15 Debtor believes that the above objections have all been resolved based on discussions with the
16 trustee's case analyst on 10/14/2010 and 10/27/2010, and therefore, there are no legal and/or
factual issues to be resolved by the court in connection with the trustee's prior objections.

17 Debtor also complied in full with the court's order dated 1/19/2011 to make payment of
18 \$11,577.15 to the Chapter 13 Trustee by 2/2/2011, as debtor presented payment to the trustee on
2/2/2011 of the full amount before 4PM as required.

19 Debtor believes that she has addressed all trustee and secured creditor objections to the plan, and
20 has provided full payment to the trustee as required by the court. As a result, debtor believes that
the plan is ready to be confirmed.

21 Debtor's attorney's application for compensation under the no-look fee guidelines has not yet
22 been approved by the court, but this is not a barrier to plan confirmation.

23 Dated: 2/21/2011

/s/ Zachary Tyson, esq.
Attorney for Debtor